

REMARKS**BEST AVAILABLE COPY**

This is a full and timely response to the outstanding non-final Office Action mailed October 17, 2005. Claims 22-24, 26-27, and 43 have been allowed. Reconsideration and allowance of pending claims 28-30, 34-37, and 44-45 are respectfully requested.

Claim Rejections - 35 U.S.C. § 102(e)**A. Rejection of Claims 28-30 and 34**

Claims 28-30 and 34 have been rejected under 35 U.S.C. § 102(e) as being anticipated by *Blair* (U.S. Patent No. 6,520,617). Applicants respectfully traverse this rejection.

Regarding claims 28-30 and 34, Applicants submit that *Blair* appears to suggest an inkjet printhead "having a barrier layer and a separate orifice plate" or an "integral barrier/orifice structure that can be made, for example, using a single photopolymer layer." Col. 2, lines 60-65. *Blair* further states that "an orifice 21 can include an outlet counterbore 21a." Therefore, *Blair* does not show a "a top coat layer [in addition to the claimed first polymer level and second polymer level where the top coat layer] defin[es] a countersunk bore corresponding to an opening of the nozzle from which fluid is ejected," as recited in independent claim 28, and "a top coat layer [in addition to the claimed first polymer level and second polymer level where the top coat layer] defin[es] a countersunk bore associated with an opening of the nozzle from which fluid is ejected," as recited in independent claim 34. Accordingly, the rejection of claims 28-30 and 34 should be withdrawn.

BEST AVAILABLE COPY**B. Rejection of Claims 29, 35-37, and 44-45**

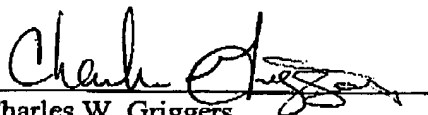
Claim 29 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Blair* in view of *Mrvos* (U.S. Patent No. 6,409,312). Claims 35-37 and 44-45 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Blair* in view of *Radke* (U.S. Patent No. 6,054,011). Applicants respectfully traverse these rejections.

For example, Applicants submit that neither *Mrvos* nor *Radke* teaches or suggests a top coat layer defining a countersunk bore corresponding to or associated with to an opening of the nozzle from which fluid is ejected, as recited in independent claims 28 and 34. Thus, claims 29, 35-37, and 44-45 (which depend from respective independent claims 28 and 34) are allowable over the proposed combinations for at least this reason.

CONCLUSION

Applicants respectfully submit that Applicants' pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,


Charles W. Griggers
Registration No. 47,283